

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 15-4268-JOB

ANGEL DELEON et. al.,

Defendants.

DEFENDANT'S EXHIBIT LIST

Comes Now Defendants Anthony Ray Baca, Carlos Herrera, Rudy Perez and Daniel Sanchez, by and through their respective attorneys and hereby submit their Joint Exhibit List for Counts 6-7. In addition to the specific exhibits, listed below, defendants reserve the right to offer any exhibit admitted at any pretrial hearing in this case, and the right to introduce additional exhibits subsequent to the disclosure and/or review of the 16,000 hours of inmate phone calls recently disclosed, the government's witness list, the government's exhibit list, Jencks materials and the additional discovery the government has promised, yet not produced. Defendants also reserve the right to amend the witness list if any severance of defendants and/or counts is granted.

X	Description	Stipulated	Offered	Admitted	Rejected
	SNMCF Facility: Diagrams and Photographs				
A	Diagram SNMCF Level III IV V Facility Layout				
B	Google Map-SNMCF-Labeled				
C	Diagram SNMCF Housing Unit 1A				
D	Diagram SNMCF Housing Unit 1A-B Pod aka “Blue Pod”				
E	Diagram SNMCF Housing Unit 1A-B Pod aka “Blue Pod” showing directions of Photos				
E1	Photo				
E2	Photo				
E3	Photo				
E4	Photo				
E5	Photo				
E6	Photo				
E7	Photo				
E8	Photo				
E9	Photo				
E10	Photo				
E11	Photo				
E12	Photo				
E13	Photo				
E14	Photo				
E15	Photo				
E16	Photo				
E17	Photo				
E18	Photo				
F	Generic Diagram of Inmate Cell SNMCF Unit 1A				

F1	Photo				
F2	Photo				
F3	Photo				
F4	Photo				
F5	Photo				
F6	Photo				
F7	Photo				
G	Diagram SNMCF Housing Unit 1A-A Pod aka "Yellow Pod" Showing Directions of Photos				
G1	Photo				
G2	Photo				
G3	Photo				
G4	Photo				
G5	Photo				
G6	Photo				
G7	Photo				
G8	Photo				
G9	Photo				
G10	Photo				
G11	Photo				
G12	Photo				
G13	Photo				
G14	Photo				
H	Joni and Friends Wheels for the World Restoration Manual				
H1	Photo				
H2	Photo				
H3	Photo				
H4	Photo				
H5	Photo				
I	Video 03/07/2014 SNMCF Unit 1A-B Pod				
I1	Video Channel 4				
I2	Video Channel 5				
J	Diagram SNMCF Blue Pod showing Approximate Location of Evidence Recovery				

K	Diagram of SNMCF Blue Pod showing Approximate Location of Evidence Recovered showing location of Photos (below)				
K1	Photo				
K2	Photo				
K3	Photo				
K4	Photo				
K5	Photo				
K6	Photo				
K7	Photo				
K8	Photo				
K9	Photo				
K10	Photo				
L	Reserved				
	PNM Facility: Diagrams and Photographs				
M	Diagram PNM Facility Layout				
N	Google Map PNM Facility-Labeled				
O	Diagram PNM Level VI Facility				
P	Diagram PNM Level VI Housing Units 3A and 3B				
Q	Diagram PNM Level VI Housing Unit Q showing direction of Photos				
Q1	Photo				
Q2	Photo				
Q3	Photo				
Q4	Photo				
Q5	Photo				
Q6	Photo				
Q7	Photo				

Q8	Photo				
Q9	Photo				
Q10	Photo				
Q11	Q Pod video				
R	Q Pod Chart re Inmates Housing Overlap				
S	SNMCF Logs Housing Unit 1A				
S1	Day Shift Log 03/06/2014				
S2	Swing Shift Log 03/06/2014				
S3	Graveyard Shift Log 03/06/2014				
S4	Day Shift Log 03/07/2014				
S5	Swing Shift Log 03/07/2014				
S6	Swing Shift Log (typed) 03/07/2014				
T	NMCD Transportation Records 03/06/2014 (13 pgs)				
U	Property Inventory Lists				
U1	Enriquez, Reynaldo SNMCF Prop Inventory List 03/07/2014				
U2	Urquiza, Guadalupe PNM Property Inventory List 03/06/2014				
U3	Varela, Mauricio PNM Property Inventory List 03/08/2015				
V	Offender Physical Location Histories				
	Armenta, Jerry				
	Baca, Anthony Ray				
	Calburt, David				
	Cordova, Billy				
	Duran, Eric				
	Herrera, Carlos				
	Martinez, Robert				
	Martinez, Roy Paul				
	Martinez, Timothy				
	Molina, Javier				
	Montoya, Jerry				

	Montoya, Mario				
	Perez, Rudy				
	Rodriguez, Mario				
	Romero, Julian				
	Rubio, Javier				
	Sanchez, Daniel				
	Sanchez, Robert				
	Urquiza, Guadalupe				
	Varela, Mauricio				
	Wright, Jason				
W	New Mexico Corrections Department Policies and Procedures				
W1	CD Policy 080100 Custody Level Designations and Facility Security Levels				
W2	CD Policy 090100 Inmate Discipline				
W3	CD Policy 090300 Institutional Evidence/Contraband Control, Tracking and Disposal				
W4	CD Policy 130700-130701 CAMERAS: Digital Video Recording, Portable, Stationary, Pan/Tilt/Zoom				
W5	CD Policy 150200 Inmate Property and Laundry				
W6	CD Policy 150201 Inmate Property				
X	Reserved				
Y	Reserved				
Z	Reserved				
	Witness Specific Information [the first two are examples but until we can read/review Jencks, telephone calls				

	etc, we cannot id specific exhibits needed for each cooperating witness.]				
AA	Archuleta, Gerald				
AA1-?	Judgement and Commitment Orders for prior convictions				
AA?-?	Records re Payments and Benefits				
AA?-?	Excerpts from Recorded Telephone calls				
AB	Armenta, Jerry				
	Judgment and Commitment Orders for prior convictions				
	Records re Payments and Benefits				
	Excerpt from "Family Contact Visit" Video				
	Excerpt(s) from Recorded Telephone calls				
AC	Calburt, David				
	Judgment and Commitment Orders for prior convictions				
	Records re Payments and Benefits				
	Excerpt(s) from Recorded Telephone calls				
AD	Cordova, Billy				
AE	Duran, Erik				
AF	Martinez, Timothy				
AG	Martinez, Robert				
AH	Martinez, Roy Paul				
AI	Montoya, Jerry				
AJ	Montoya, Mario				
AK	Rodriguez, Mario				
AL	Romero, Julian				

AM	Rubio, Javier				
AN	Urquizo, Lupe				

Respectfully submitted,

/s/ Amy E. Jacks
 AMY E. JACKS
 Attorney for Defendant
 DANIEL SANCHEZ

CERTIFICATE OF SERVICE

I hereby certify that on January 12, 2018, I caused a true and correct copy of the Joint Exhibit List for Counts 6-7 to be served by e-mail to all parties by filing in the Court's CM/ECF system.